

### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2015-2017.

Application 14-11-007 (Filed November 18, 2014)

And Related Matters.

Application 14-11-009 Application 14-11-010 Application 14-11-011

ANNUAL PROGRESS REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON THE FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAM, JANUARY 1, 2018 - DECEMBER 31, 2018

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Dated: May 1, 2019

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Pacific Gas and Electric Company files its Annual Progress Report on its 2018 Family

Electric Rate Assistance Program for the period of January 1 through December 31, 2018.

Respectfully submitted:

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# ANNUAL PROGRESS REPORT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION

### FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAM ANNUAL REPORT FOR PROGRAM YEAR 2018

May 1, 2019

PACIFIC GAS AND ELECTRIC COMPANY FERA PROGRAM MAIL CODE N7R PO BOX 770000 SAN FRANCISCO, CA 94177

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### FAMILY ELECTRIC RATE ASSISTANCE (FERA)

PG&E has administrated the Family Electric Rate Assistance (FERA) program since 2004. The FERA program provided a monthly 12 percent discount on electric bills for income qualified households of three or more persons. In compliance with Senate Bill 1135 (Bradford, 2018) and California Public Utilities Code §739.12, the FERA program discount will increase to 18 percent effective January 1, 2019.

The FERA program, also known as the Lower Middle Income Large Household program, was authorized by the Commission in Decision (D.) 04-02-057 and is a rate assistance program for lower to middle income large household participants of three or more people and the household has an income between 200 percent +\$1 and 250 percent of the Federal Poverty Guideline levels. The FERA program was designed to assist large families that are ineligible for the California Alternate Rates for Energy (CARE) rate because their income level is slightly above the CARE program income limits. Domestic customers in individually metered single-family accommodations, or domestic submetered tenants residing in multifamily master-metered accommodations meeting the above income guidelines, are eligible to receive the FERA discount. Qualifying Direct Access, Community Choice Aggregation, and Transitional Bundled Services customers are also eligible for FERA assistance.

Customers or sub-metered tenants participating in the CARE program cannot concurrently participate in the FERA program.

Initially, the Commission requested FERA program to coordinate its outreach activities with the CARE program at little or no additional cost, stating:

Additional outreach should be undertaken when it can be done at little cost, e.g., a brief statement in literature related to CARE, low income energy efficiency programs, or level payment options that information regarding the large household program may be obtained by calling the utility.<sup>1</sup>

The Comission recently ordered increased emphasis be place on the FERA program. In D.18-08-013, issued on August 17, 2018 in PG&E's 2017 General Rate Case Phase 2 proceeding, the Commission ordered PG&E to make significant efforts to increase FERA enrollment over the next six years, from 2018 – 2023, with the goal of achieving a 50 percent FERA program subscription level. The Commission also ordered PG&E to report on the progress to increase FERA enrollment by filing information-only advice letters at the end of each year, from 2018 – 2023.<sup>2</sup>

At year-end 2018, PG&E estimated that 169,219 of its customers within PG&E's territory were eligible for the FERA discount and 23,600 customers were enrolled in the FERA program, representing 14 percent of the PG&E's estimated eligible population. Since the inception of the

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<sup>&</sup>lt;sup>1</sup> D. 04-02-057, p. 57.

<sup>&</sup>lt;sup>2</sup> D. 18-08-013, pp. 74-76, 181 (Ordering Paragraph (OP) 15).

FERA program, nearly \$65.4 million in cumulative subsidies have been provided to FERA eligible customers.

### I. PARTICIPANT INFORMATION

### A. Provide the total number of FERA customers by month, for the reporting period.

PG&E provides the total number of FERA customers by month, for the reporting period, at Table 1.

| Table 1   |                               |  |  |  |
|-----------|-------------------------------|--|--|--|
| 2018      | FERA<br>Enrolled <sup>1</sup> |  |  |  |
| January   | 26,982                        |  |  |  |
| February  | 26,853                        |  |  |  |
| March     | 26,938                        |  |  |  |
| April     | 26,230                        |  |  |  |
| May       | 25,316                        |  |  |  |
| June      | 25,116                        |  |  |  |
| July      | 24,941                        |  |  |  |
| August    | 24,731                        |  |  |  |
| September | 25,375                        |  |  |  |
| October   | 24,364                        |  |  |  |
| November  | 23,858                        |  |  |  |
| December  | 23,600                        |  |  |  |

Note:

<sup>&</sup>lt;sup>1</sup> Does not include sub-metered tenants.

### B. Provide the total number of FERA-eligible households, FERA-participating households, and FERA household penetration rates by quarter.

PG&E provides the total number of FERA-eligible households, FERA-participating households, and FERA household penetration rates by quarter, at Table 2.

| Table 2                |  |   |   |  |  |  |
|------------------------|--|---|---|--|--|--|
| FERA Penetration Rate  |  |   |   |  |  |  |
| 2018<br>Quarter Ending | FERA-Eligible<br>Households <sup>1</sup> | FERA-Participating<br>Households <sup>1</sup> | FERA Household<br>Penetration Rate <sup>2</sup> |  |  |  |
| March 31               | 169,219                                  | 26,938  | 16 percent                                      |  |  |  |
| June 30                | 169,219                                  | 25,116  | 15 percent                                      |  |  |  |
| September 30           | 169,219                                  | 25,375  | 15 percent                                      |  |  |  |
| December 31            | 169,219                                  | 23,600  | 14 percent                                      |  |  |  |

#### Notes:

### C. Discuss how the estimates of current FERA-eligible households were developed.

To develop current estimates of FERA-eligible households, PG&E, Southern California Edison Company, Southern California Gas Company, and San Diego Gas and Electric Company leveraged the CARE joint utility methodology adopted by the CPUC in D.01-03-028 for developing monthly penetration estimates. The IOUs have contracted with a vendor, Athens Research, to conduct the eligibility estimates. This methodology is believed to be appropriate for estimating FERA eligibility in the renewed effort to increase FERA enrollments. This methodology entails annual estimation of eligibility for CARE, ESA, and other income-by-household size parameters at the small area (block group, census tract, ZIP+2, etc.) for each IOU territory and for the state as a whole.

The requirements for 2018 eligibility, corresponding to the current estimation, again used the January Health and Human Services (HHS) Poverty Guidelines [Federal Register / Vol. 83, No. 12 /Thursday, January 18, 2018 /Notices; p.2643].

Sources for the estimation include the current HHS guidelines, current year small area vendor marginal distributions on household characteristics, Census 2010 SF3 data, Census American Community Survey 2012-2016 Public Use Microdata Sample (PUMS) data, utility meter and master meter household counts, Department

<sup>&</sup>lt;sup>1</sup> Does not include sub-metered tenants

<sup>&</sup>lt;sup>2</sup> FERA Household Penetration Rate is calculated by dividing FERA Participating Households by FERA-Eligible Households.

of Finance Consumer Price Index series, and various Geographic Information System sources. An important change has been implemented since 2011, which involves adjusting small area (block group) income distributions to match the latest American Community Survey distributions at the Public Use Microdata Area.

Estimates from the block group level are aggregated to county/utility and whole utility level, among other aggregations. Annually, PG&E applies county/utility level eligibility fractions to a new set of "technical eligibility counts" (for FERA these are metered and sub-metered occupied housing units) obtaining an estimate of income/demographic eligibility in household count form.

PG&E counts the number of households (by small area, by county, and overall) that are enrolled in FERA. The FERA household total, including individually metered and sub-metered occupied housing units, is divided by the total income/demographic eligibility.

In 2009, the method was augmented to better incorporate the impact of labor force changes (unemployment and other forms of job separation, as well as positive changes that are expected to occur in California subsequent to the recession). The method adjusted block group marginal distributions on household income based on sub-state modeling that incorporated Current Population Survey, Integrated Public Use Microdata Survey data, American Community Survey Data, and California Employment Development Department county and Metropolitan Statistical Area level labor force series. This adjustment to block group income marginal is then incorporated into the otherwise "standard" estimation approach to produce small area estimates reflecting small area income changes due to labor market forces.

In 2012, Athens Research developed an improved method for estimation of payer status-specific eligibility. This method took into consideration American Community Survey microdata relationships between guideline status (above/below 200 percent FPG), tenure, and fuel payment relationships. These cross classifications are fitted to small area (block group) marginal to produce payer type specific distributions, which can be aggregated to various other geographical levels.

#### D. Provide the current FERA sub-metered tenant counts at year-end.

There were 181 sub-metered tenants enrolled in the FERA program at year-end 2018.

### E. Discuss any problems encountered during the reporting period administering FERA for sub-metered tenants and/or master-meter customers.

The problems encountered by sub-metered tenants and/or master-metered customers include: 1) understanding the FERA discount on their bills; 2) understanding the difference between the FERA discount and the CARE discount;

and 3) understanding whether or not these customers can apply for both discounts. These were consistent issues throughout the reporting period.

PG&E provides a monthly FERA certification report to landlords/managers. PG&E also requests that landlords/managers contact PG&E when tenant information needs to be updated. Nonetheless, some landlords/managers still fail to notify PG&E when a FERA-certified tenant moves out of the facility.

PG&E also experienced problems obtaining sufficient FERA discount information on the tenant's bill from the facility billing agency. For example, the billing agency may not display the FERA discount as a separate line item on a bill, making it difficult for the tenants to verify whether they were receiving the discount. In this situation when the tenant calls PG&E to inquire about the FERA discount, PG&E confirms whether the tenant is certified for the program and reviews the bill with the tenant to ensure they are receiving the discount. If it appears the tenant is not receiving the FERA discount, the tenant is advised to contact their manager or billing agency for further clarification. If the tenant does not obtain resolution with their billing agency and/or sub-metered facility manager, PG&E advises the tenant to contact their County's Department of Weights and Measures (DWM). DWM helps tenants with meter reading accuracy/testing, proper meter installation, billing accuracy, and verification of the correct rate. If contacting the DWM does not resolve the tenant's billing question, the tenant is advised to file a complaint with the CPUC.

PG&E observed continued turnover within mobile home park ownership (MHP) and management in 2018, which resulted in undelivered reports and delayed communications. Whenever a change of ownership or change of management occurred, PG&E contacted new owners to transfer existing FERA-certified tenants' data to new accounts, updated the contact information in the database and informed owners and management about the FERA program and processes. To promote the FERA program, PG&E also mails program applications to landlords/managers annually so the landlords/managers can have the program applications available onsite to eligible tenants. However, some of these packets of applications are either returned or undelivered due to the high turnover of landlords/managers, which results in lower new enrollments.

Additionally, tenants may have moved from one MHP to another MHP or from a residential house to a MHP and thought their FERA discount would be transferable. In these cases, PG&E explained to these customers that the discount is not transferable and advise them to complete a new Sub-Meter application and apply for FERA.

### II. PROGRAM COSTS

#### A. Discount Cost

### 1. State the average monthly FERA discount received, in dollars per FERA customer.<sup>1</sup>

The average monthly FERA discount in 2018, per FERA customer, was \$17.30.

Note

#### 2. State the cumulative annual discount for all FERA customers.<sup>1</sup>

The 2018 annual FERA discount was \$5,254,958. The 2004 through 2018 cumulative annual discount is \$65,421,372.

Note:

#### **B.** Administrative Costs

### 1. Show the FERA Program's administrative costs by category.

PG&E provides the FERA program's administrative costs by category, at Table 3.

| Table 3  |             |  |  |  |
|--|-------------|--|--|--|
| FERA Program Administrative Costs by Category and Benefits |             |  |  |  |
| Category   | Cost        |  |  |  |
| Outreach   | \$6,675     |  |  |  |
| Processing, Certification, and Verification                | \$506       |  |  |  |
| General Administration                                     | \$0         |  |  |  |
| Billing System / Programming                               | \$612       |  |  |  |
| Regulatory Compliance                                      | \$0         |  |  |  |
| Energy Division Staff Funding                              | \$0         |  |  |  |
| TOTAL PROGRAM COSTS [1] [2]                                | \$7,793     |  |  |  |
| CUSTOMER BENEFITS  | \$5,254,958 |  |  |  |
| TOTAL PROGRAM COSTS & CUSTOMER BENEFITS                    | \$5,262,751 |  |  |  |

<sup>&</sup>lt;sup>1</sup> Does not include sub-metered tenants.

<sup>&</sup>lt;sup>1</sup>Does not include sub-metered tenants.

[1] Per GRC D.17-05-013, employee benefit burdens are included in the program recorded costs and in the FERA balance when it is transferred for recovery.

[2] Per GRC D.18-08-013, additional \$11,608 was recorded in the CARE program marketing budget category for incremental CARE/FERA marketing efforts.

#### 2. Explain what is included in each administrative cost category.

**Outreach:** This category includes costs related to bill inserts, applications (printing and mailing), postage, sub-metered outreach, information technology (technical support and software licensing), staff labor, event staffing, website design, and other outreach.

**Processing, Certification and Verification:** This category includes costs related to staff labor for application processing, certification, recertification, verification and training.

**General Administration:** This category includes costs related to office supplies, printing, program management labor, travel expenses, conference, training, and information technology (technical support and software licensing).

**Billing System / Programming:** This category includes costs related to manual rebilling, Information Technology (IT) programming, software enhancements, system maintenance and IT labor.

**Regulatory Compliance:** This category includes costs related to program applications and advice filings, comments and reply comments, hearings, reports and studies, working group meetings, public input meetings, and tariff revisions.

**Energy Division Staff Funding:** This category includes costs related to funding for the Energy Division staff.

**Customer Benefits:** This category includes costs related to rate discounts.

### 3. Explain how costs of joint CARE/FERA activities are charged to each program.

For joint CARE/FERA activities, PG&E charges the expenses to the appropriate CARE/FERA order numbers based on the nature of the activities and the number of hours spent on each program.

Per D. 18-08-013, PG&E filed a supplemental to PG&E's Advice Letter (AL) 3990-G/5329-E with Marketing and Outreach (M&O) Plan for FERA program. The M&O Plan detailed its proposals to use available and unspent funds from these previously-approved CARE marketing funds for incremental CARE/FERA M&O efforts described in the Plan from 2018-2020.

### C. Provide the year-end December 31 balances for the FERA balancing account for both the current and prior reporting periods.

The year-end December 31, 2018 balance for the FERA balancing account was a debit of \$5,340,842.

The year-end December 31, 2017 balance for the FERA balancing account was a debit of \$6,396,125.

The year-end December 31, 2016 balance for the FERA balancing account was a debit of \$5,564,978.

The year-end December 31, 2015 balance for the FERA balancing account was a debit of \$3,621,240.

The year-end December 31, 2014 balance for the FERA balancing account was a debit of \$6,312,202.

The year-end December 31, 2013 balance for the FERA balancing account was a debit of \$7,777,274.

The year-end December 31, 2012 balance for the FERA balancing account was a debit of \$7,873,940.1

The year-end December 31, 2011 balance for the FERA balancing account was a debit of \$7,881,273.

The year-end December 31, 2010 balance for the FERA balancing account was a debit of \$6,671,717.

The year-end December 31, 2009 balance for the FERA balancing account was a debit of \$4,643,804.

The year-end December 31, 2008 balance for the FERA balancing account was a debit of \$2,566,392.

The year-end December 31, 2007 balance for the FERA balancing account was a debit of \$1,603,094.

The year-end December 31, 2006 balance for the FERA balancing account was a debit of \$1,658,767.

The year-end December 31, 2005 balance for the FERA balancing account was a debit of \$1,340,372. <sup>2</sup>

The year-end December 31, 2004 balance for the FERA balancing account was a debit of \$340,948.

#### Notes:

### III. OUTREACH

### A. Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

For the majority of 2018, prior to receipt of the GRC Decision 18-08-013, PG&E's outreach for the FERA program was coordinated with PG&E's CARE and Energy Savings Assistance (ESA) programs outreach efforts consistent with the direction in D.04-02-057, at page 56, that, "[A]dditional [FERA] outreach should be undertaken when it can be done at little cost."

The following are 2018 outreach initiatives undertaken by the CARE program at no additional cost or minimal cost to promote the FERA program:

**Bill Inserts -** PG&E inserted postage-paid bilingual applications in English and Spanish into customers' monthly bill packages six times throughout 2018. This initiative reached residential PG&E customers who were not already enrolled in the CARE or FERA programs.

Community Events and Engagement - PG&E's Community Engagement (CE) staff partnered with community based organizations to create awareness and provide education about low income programs:

• PG&E partnered with the California School Age Consortium (CalSAC) to promote PG&E's Energenius® curriculum to out-of-school time (OST) field staff. The OST field staff CalSAC serves encompasses afterschool, school-age child care, school-based programs, summer learning, parks and recreation, YMCA's, Boys and Girls Clubs, private programs, licensed family home care, and community based organizations. Not only do these programs provide safe places for children, they also help working families and employ members of the community. These programs also provide meaningful first time jobs and

<sup>&</sup>lt;sup>1</sup> The December 31, 2012 figures were adjusted and different from the 2012 Annual Report.

<sup>&</sup>lt;sup>2</sup> The December 31, 2005 figures were adjusted and different from the 2005 Annual Report.

career pathways to teaching and other youth serving professions. In order to expand on these afterschool programs in hard-to-reach communities, PG&E and CalSAC collaborated to market the new Energenius® OST program in an effort to raise awareness about environmental stewardship and to increase access to PG&E services, like CARE/FERA and ESA, for low-income families.

- PG&E continued the Community Ambassador Pilot Program (CA) that started in 2016 through 2018. PG&E partnered with five nonprofit organizations that serve the following counties: Alameda, Marin, Monterey, Sacramento, San Benito, San Francisco, San Mateo, Santa Clara, and Santa Cruz. These CA organizations served as PG&E's "point of contact" resource for community engagement efforts and were designed to foster trust and connections through targeted community partnerships. They were equipped to deliver county-based customer in hard-to-reach communities. They completed comprehensive program training that included additional capacity building tools such as customer service skills, outreach best practices, and program knowledge on the full breadth of PG&E's Low Income Portfolio of programs and services. Community Ambassadors also supported hard to reach customers by staffing or hosting community events.
- Through the Health Outreach Workers Initiative, PG&E partnered with Vision y Compromiso, a nonprofit organization supporting the Latino community, to deliver a culturally and linguistically specific outreach community engagement model that provides community-based health outreach workers with relevant training and support to increase Latino families' awareness of and enrollment in PG&E's low income portfolio of programs while also enhancing families' energy education and energy savings. Eight health outreach workers helped PG&E reach out to strategic networks that promoted the penetration of low income programs through education. This outreach effort was focused in Alameda and Yolo counties in 2018. Outreach activities undertaken by this group included Spanish markets, churches, schools, Women Infant Children (WIC) offices and farm fields.

In 2018, PG&E participated in community events to engage customers about low income assistance programs and services that help customers save money and energy.

 PG&E Community Engagement (CE) staff participated in and/or supported 215 community and local PG&E Customer Service Office (CSO) outreach events to create awareness and provide education about assistance programs. These outreach events were staffed by Customer Service Representatives (CSRs) helping customers with questions and understanding their accounts and educating customers about CARE, ESA, FERA and assistance programs. CSRs provided information on Medical Baseline, Budget Billing, Large Print Bills, and In-Language Bills to give customers more information on our programs.

**Email and Direct Mail -** PG&E leveraged the CARE acquisition campaigns to outreach to potential FERA customers, including direct mail and email in bilingual English and Spanish.

Additionally, customers could also call PG&E directly at 1-800-743-5000 to self-certify their eligibility and enroll/recertify in the FERA program via Automated Voice Messaging (AVM) technology.

**Integration -** The FERA program is integrated with CARE, Cooling Centers and ESA programs in an effort to generate FERA enrollments. FERA applications are available to participants at Cooling Centers partnering with PG&E. FERA program information and applications are also distributed at various CARE and ESA program outreach events. Also, CARE Community Outreach Contractors (COCs) assisted in enrolling FERA customers at no additional cost to PG&E.

CARE customers who notified PG&E of a change in income status and no longer qualified for the CARE discount, were then informed about the FERA program and provided with an opportunity to apply, if qualified. Additionally, customers who applied for the CARE discount and were ineligible, but income-qualified for the FERA discount, were automatically enrolled in the FERA program.

FERA features other financial assistance information on its applications. Each 8.5" x 11" application provides a brief description of other assistance programs available as well as contact numbers.

FERA applications are also available at PG&E's local offices. Local office customer service representatives (CSRs) have been trained to speak about the program benefits with every customer and mail any completed applications to the FERA program team on a regular basis.

**Online Enrollment -** PG&E relies upon its website and mobile platform to promote the FERA program, by providing detailed information about FERA and other assistance programs. With online applications available in several languages, customers can enroll using one of two options: complete a simple non-automated form which requires no registration, or via "Your Energy", which requires registration for sign-in or one time access. Customers are able to complete the necessary household and income eligibility information, and submit the application electronically.

PG&E utilizes an online mailbox – <u>CAREandFERA@pge.com</u> – as an internal and external communication tool for any program-related inquiries.

In order to make it easier for customers to get enrolled in the right program, PG&E launched a combined version of the CARE and FERA website landing page to simplify program requirement presentation, highlight key program differences and increase FERA visibility. Additionally, a homepage module went live January 1, 2019 featuring the increased FERA discount from 12 percent to 18 percent.

**Seniors and Disabled -** PG&E's FERA program continued its outreach to seniors and those with disabilities by having the large-print applications (minimum 16 point font) in the same languages as noted above available in print and on its website, which is mobile friendly and meets ADA standard for accessibility.

**Sub-Metered** - PG&E reached out to sub-metered tenants by mailing enrollment packets to sub-metered facility managers across its service area. The packets informed managers about the FERA program benefits and encouraged them to distribute applications to their tenants.

In D.18-08-013, the CPUC ordered PG&E to make significant efforts to increase FERA enrollment over the next six years, from 2018 – 2023, with the goal of achieving a 50 percent FERA program subscription level.<sup>3</sup> Based on the directives in D.18-08-013, PG&E developed and submitted the FERA Marketing and Outreach (M&O) Plan via PG&E's AL 3990-G-B/5329-E-B on October 8, 2018. This AL also informed the Commission of PG&E's plans to use unspent, previously authorized CARE marketing funds on additional marketing and outreach efforts in 2018 through 2020 to increase FERA enrollment.

As outlined in the M&O plan, in August and September the marketing and outreach team performed data and insights review, including examination of attributes in the FERA customer profile and analysis of the marketing universe. This analysis looked at residential customers not enrolled in either the CARE or FERA program in order to evaluate the potential for creating targeted marketing campaigns that would reach those customers who were more likely to be eligible for FERA.

Using the CARE propensity model as a foundation, additional filters of household income and household size were applied to identify a marketing universe of approximately 89,000 targetable customers. PG&E plans to launch direct mail and email testing in the first half of 2019 using this approach to generate targeted lists. PG&E also plans to optimize existing CARE/FERA campaigns on an ongoing basis as results from the tests become available.

<sup>&</sup>lt;sup>3</sup> D. 18-08-013, pp. 74-76, 181 (Ordering Paragraph (OP) 15).

In December, PG&E initiated the creative development process to conduct marketing tests in 2019, including web page content, new digital ads, direct mail, email and mailbox inserts. The media strategy was adjusted to include considerations such as "hypertargeting" areas with lower FERA penetration, and increasing digital media weight in the Central Valley.

Several immediate changes were made to ongoing tactics, including revising the CARE/FERA bill insert for November to increase the prominence of FERA messaging and place FERA in the first panel headline.

Next, in compliance with the order to work with community-based organizations (CBOs) in the Central Valley to increase rates of FERA participation, PG&E partnered with Central California Legal Services - a community based organization (CBO) located in Fresno, Merced and Visalia - to hold a FERA workshop together with a community resource fair at the Arambula Resource Fair in Selma, CA on October 25, 2018. Community resource fairs include outreach on health services, immigration, education and financial literacy. At this fair, PG&E and Central California Legal Services set up tables with FERA and other assistance program materials displayed. As customers passed through the fair, PG&E and Central California Legal Services staff educated customers on the FERA program. PG&E also had a safety demonstration table set up and to showcase safety tips with customers. The exact number of customers that attended the fair was not tracked.

Additionally, PG&E has identified 9 key strategic CBO partnerships in geographic areas with high FERA eligible population, especially in the Central Valley, to conduct performance based outreach on PG&E's behalf in 2019. These 9 CBOs will conduct grassroots outreach through community events (including resource fairs where appropriate), workshops, faith-based outreach, door-to-door campaigns as well as via one-on-one case management where applicable.

#### B. Discuss each of the following:

1. How FERA customer data and other relevant program information is shared within the utility, for example, between the ESA Program and other appropriate low-income programs.

The FERA discount is recorded directly into the customer information system. This allows CSRs to see the FERA status of any customer calling PG&E's contact center for assistance. This provides important information for the CSR to use when discussing other benefits and services that may be of assistance to the income-qualified customer. FERA program also ultilizes the same system database as the CARE program, therefore relevant program information is shared between CARE, ESA and other low-income programs.

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<sup>&</sup>lt;sup>4</sup> D.18-08-013, Ordering Paragraph 15, PG&E should work with community-based organizations (CBOs) in the Central Valley to increase rates of FERA participation. PG&E should hold one or more workshops in the Central Valley in 2018 with local CBOs toward this effort."

2. Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.

PG&E did not encounter any barriers to participation during 2018. Although we do not have hard research, we believe that the co-presentation of the CARE and FERA discounts enrollment on the same application, suppresses the FERA enrollments as they are both non-income verification programs. Further collateral testing in 2019 will increase our understanding of this theory.

### IV. PROCESSING FERA APPLICATIONS

- A. Processing Self-Certification and Self-Recertification Applications (individual and sub-metered customers)
  - 1. Provide the number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period.

PG&E provides the number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period, at Table 4.

| TABLE 4  |                       |          |          |        |                                |            |
|--|-----------------------|----------|----------|--------|--------------------------------|------------|
| FERA Self-Certification and Self-Recertification Applications <sup>1</sup> |                       |          |          |        |                                |            |
|  | Provided <sup>2</sup> | Received | Approved | Denied | Pending/<br>Never<br>Completed | Duplicates |
| Utility  | 12,082                | 11,944   | 11,064   | 110    | 770                            | 1,933      |
| Capitation   | 0                     | 0        | 0        | 0      | 0                              | 0          |
| Other<br>Third-Party   | 0                     | 0        | 0        | 0      | 0                              | 0          |
| Total  | 12,082                | 11,944   | 11,064   | 110    | 770                            | 1,933      |

Notes:

<sup>&</sup>lt;sup>1</sup> Includes sub-metered tenants.

<sup>&</sup>lt;sup>2</sup> Excludes CARE/FERA outreach applications and multiple bill inserts.

#### **B.** Processing Random Post-Enrollment Verification Requests

1. Provide the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period.

PG&E provides the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period, at Table 5.

| TABLE 5 |  |          |                       |        |                                |            |
|---------|--|----------|-----------------------|--------|--------------------------------|------------|
|         | FERA Random Post-Enrollment Verification Requests <sup>1</sup> |          |                       |        |                                |            |
|         | Requested  | Received | Approved <sup>2</sup> | Denied | Pending/<br>Never<br>Completed | Duplicates |
| Total   |  |          | 878                   |        |                                |            |

#### Notes:

#### V. Program Management

A. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

As stated above, prior to D. D.18-08-013, the FERA program does not have a separate, authorized budget and is dependent on CARE outreach efforts. For that reason, the program was administered incrementally within the CARE program Administrative budget and provides FERA outreach to customers at no additional, or minimal cost from January through August 2018. Although PG&E increased its marketing and outreach in late 2018, it does not expect to realize the impacts to increased FERA enrollment until the latter half of 2019. For 2018, FERA program penetration was at 14 percent.

In an ongoing effort to protect the environment, reduce printing and mailing costs, and increase self-services, PG&E continues to encourage residential customers to utilize our toll-free line, website, and online tools for enrollment and recertification. PG&E also encourages sub-metered facility landlords/managers to sign-up to receive their monthly FERA certification reports via e-mail. Many facilities have requested receipt of their reports electronically.

<sup>&</sup>lt;sup>1</sup> Random Post-Enrollment Verification was not conducted specifically for FERA in 2018 due to the small number of enrollments and discounts.

<sup>&</sup>lt;sup>2</sup> CARE Post-Enrollment Verification requests approved for FERA in 2018.